

January 27, 2023

VIA ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Melody Business Finance, LLC v. Falcone et al.*, No. 22-cv-1698 (KPF)

Dear Judge Failla:

Plaintiff Melody Business Finance LLC and Defendant United States of America respectfully submit this joint letter requesting that the Court stay any further proceedings in the above-referenced action.

On January 26, 2023, the parties attended a settlement conference with Magistrate Judge Aaron. We are pleased to advise that the parties have agreed upon a settlement that is conditional upon approval by the Department of Justice, which we understand will take up to 60 days.

In light of the foregoing, the parties respectfully request that this matter be stayed for 60 days pending approval of the settlement. The parties will promptly apprise the Court of further developments.

Respectfully submitted,

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